



Corporate Creations Network Inc.

801 US Highway 1 North Palm Beach, FL 33408

Ryder Truck Rental, Inc.

James Reedy Sr. Office Supervisor

Ryder System, Inc. , Ryder National Liability Claims Office

P.O. Box 2377

Centennial Co 80161

06/17/2021

SERVICE OF PROCESS NOTICE

The following is a courtesy summary of the enclosed document(s). **ALL information should be verified by you.**

Item: 2021-801

Note: Any questions regarding the substance of the matter described below, including the status or how to respond, should be directed to the contact set forth in line 12 below or to the court or government agency where the matter is being heard. **IMPORTANT:** All changes or updates to the SOP contact individuals or their contact information must be submitted in writing to SOPcontact@corpcreations.com. Any changes will become effective upon written confirmation of Corporate Creations.

1.	Entity Served:	Ryder Truck Rental, Inc.
2.	Title of Action:	Stephanie Cabrera, Olga Castaneda and Luis Montoya
3.	Document(s) Served:	Notice of Electronic Filing Summons Verified Complaint
4.	Court/Agency:	Queens County Supreme Court
5.	State Served:	New York
6.	Case Number:	713442/2021
7.	Case Type:	Negligence/Personal Injury
8.	Method of Service:	Hand Delivered
9.	Date Received:	Wednesday 06/16/2021
10.	Date to Client:	Thursday 06/17/2021
11.	# Days When Answer Due: Answer Due Date:	20 Tuesday 07/06/2021
		CAUTION: Client is solely responsible for verifying the accuracy of the estimated Answer Due Date. To avoid missing a crucial deadline, we recommend immediately confirming in writing with opposing counsel that the date of the service in their records matches the Date Received.
12.	Sop Sender: (Name, City, State, and Phone Number)	Joseph R. Bongiorno & Associates, P.C. Mineola, NY 516-741-2405
13.	Shipped To Client By:	Email Only with PDF Link
14.	Tracking Number:	
15.	Handled By:	331
16.	Notes:	None.

NOTE: This notice and the information above is provided for general informational purposes only and should not be considered a legal opinion. The client and their legal counsel are solely responsible for reviewing the service of process and verifying the accuracy of all information. At Corporate Creations, we take pride in developing systems that effectively manage risk so our clients feel comfortable with the reliability of our service. We always deliver service of process so our clients avoid the risk of a default judgment. As registered agent, our role is to receive and forward service of process. To decrease risk for our clients, it is not our role to determine the merits of whether service of process is valid and effective. It is the role of legal counsel to assess whether service of process is invalid or defective. Registered agent services are provided by Corporate Creations Network Inc.

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS**

-----X
STEPHANE CABRERA, OLGA CASTANEDA and
LUIS MONTOYA

Plaintiff/Petitioner,

- against -

TRUE VALUE COMPANY, LLC, RYDER SYSTEMS,
INC., RYDER INTEGRATED LOGISTICS, INC.

Index No. 713442/2021

Defendant/Respondent.

-----X
NOTICE OF ELECTRONIC FILING

(Mandatory Case)
(Uniform Rule § 202.5-bb)

You have received this Notice because:

- 1) The Plaintiff/Petitioner, whose name is listed above, has filed this case using the New York State Courts E-filing system ("NYSCEF"), and
- 2) You are a Defendant/Respondent (a party) in this case.

• If you are represented by an attorney:

Give this Notice to your attorney. (Attorneys: see "Information for Attorneys" pg. 2).

• If you are not represented by an attorney:

You will be served with all documents in paper and you must serve and file your documents in paper, unless you choose to participate in e-filing.

If you choose to participate in e-filing, you must have access to a computer and a scanner or other device to convert documents into electronic format, a connection to the internet, and an e-mail address to receive service of documents.

The benefits of participating in e-filing include:

- serving and filing your documents electronically
- free access to view and print your e-filed documents
- limiting your number of trips to the courthouse
- paying any court fees on-line (credit card needed)

To register for e-filing or for more information about how e-filing works:

- visit: www.nycourts.gov/efile-unrepresented or
- contact the Clerk's Office or Help Center at the court where the case was filed. Court contact information can be found at www.nycourts.gov

To find legal information to help you represent yourself visit www.nycourthelp.gov

**Information for Attorneys
(E-filing is Mandatory for Attorneys)**

An attorney representing a party who is served with this notice must either:

- 1) immediately record his or her representation within the e-filed matter on the NYSCEF site www.nycourts.gov/efile ; or
- 2) file the Notice of Opt-Out form with the clerk of the court where this action is pending and serve on all parties. Exemptions from mandatory e-filing are limited to attorneys who certify in good faith that they lack the computer hardware and/or scanner and/or internet connection or that they lack (along with all employees subject to their direction) the knowledge to operate such equipment. [Section 202.5-bb(e)]

For additional information about electronic filing and to create a NYSCEF account, visit the NYSCEF website at www.nycourts.gov/efile or contact the NYSCEF Resource Center (phone: 646-386-3033; e-mail: efile@nycourts.gov).

Dated: June 14, 2021

Joseph R. Bongiorno, Esq.	250 Mineola Blvd.
Name	Address
Law Offices of Joseph R. Bongiorno, P.C.	Mineola, New York 11501
Firm Name	
	516-741-2405
	Phone
	jrbawfirm@aol.com
	E-Mail

To: True Value Co., LLC
Ryder Systems, Inc.
Ryder Integrated Logistics, Inc.
RYDER TRUCK RENTAL, INC.

6/6/18

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

X

STEPHANIE CABRERA, OLGA CASTANEDA, and **INDEX NO.**
LUIS MONTOYA,
Plaintiff designate QUEENS
County as the place of trial
Plaintiff(s),

- against -

The basis of the venue is
the residence of plaintiffs

TRUE VALUE COMPANY, LLC, RYDER
SYSTEMS INC., RYDER INTEGRATED
LOGISTICS INC., and RYDER TRUCK
RENTAL, INC.

SUMMONS

Defendant(s).

Plaintiffs reside at
58-38 Van Cleef Street
Corona, Queens, New York 11368

X

To the above named Defendants

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your answer; or, if the Complaint is not served with this Summons, to serve a notice of appearance, on the Plaintiffs Attorney(s) within 20 days after the service of this Summons, exclusive of the day of service (or within 30 days after the service is complete if this Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief in the Complaint.

Dated: June 11, 2021

JOSEPH R. BONGIORNO & ASSOCIATES, P.C.
Attorneys for Plaintiff(s)

JOSEPH R. BONGIORNO, ESQ.
Post Office Address:
250 Mineola Boulevard
Mineola, NY 11501

DEFENDANT(S) ADDRESS:

TRUE VALUE COMPANY, LLC, 8600 Bryn Mawr Avenue, Chicago, Illinois 60631-3505
RYDER SYSTEMS INC., 11690 NW 105th Street, Miami, Florida 33178
RYDER INTEGRATED LOGISTICS INC., c/o Corporate Creations Network, Inc., 600
Mamaroneck Avenue, Suite 400 Harrison, New York 10528
RYDER TRUCK RENTAL, INC., c/o Corporate Creations Network, Inc., 600
Mamaroneck Avenue, Suite 400 Harrison, New York 10528

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SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

X

STEPHANIE CABRERA, OLGA CASTANEDA, and
LUIS MONTOYA,

INDEX NO.

Plaintiff(s),

- against -

VERIFIED COMPLAINT

TRUE VALUE COMPANY LLC, RYDER
SYSTEMS INC., RYDER INTEGRATED
LOGISTICS INC., and RYDER TRUCK RENTAL, INC.,

Defendant(s).

X

Plaintiffs, STEPHANIE CABRERA, OLGA CASTANEDA, and LUIS MONTOYA, by their
attorneys, JOSEPH R. BONGIORNO & ASSOCIATES, P.C., complaining of the defendants, TRUE
VALUE COMPANY LLC, RYDER SYSTEMS INC., RYDER INTEGRATED LOGISTICS INC., and
RYDER TRUCK RENTAL, INC., allege the following:

AS AND FOR A FIRST CAUSE OF ACTION

1. That the relief sought herein exceeds the jurisdictional limits of all the courts which would otherwise have jurisdiction.
2. That the within action falls within one or more of the exceptions set forth in CPLR § 1602.
3. That at all times mentioned herein, the plaintiffs, STEPHANIE CABRERA, OLGA CASTANEDA, and LUIS MONTOYA, were and still are residents of the County of Queens, City and State of New York.
4. That at all times mentioned herein, the defendant, TRUE VALUE COMPANY, LLC, was and still is a Delaware limited liability company duly authorized to do business in the State of New York.
5. That at all times mentioned herein, the defendant, TRUE VALUE COMPANY, LLC, was and still a Delaware limited liability company doing business in the State of New York.

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6. That at all times mentioned herein, the defendant, TRUE VALUE COMPANY, LLC, had its corporate headquarters located at 8600 West Bryn Mawr Avenue, Chicago, Illinois 60631-3505.
7. That at all times mentioned herein, the defendant RYDER SYSTEMS INC., was and still is a Florida corporation duly authorized to do business in the State of New York.
8. That at all times mentioned herein, the defendant, RYDER SYSTEMS INC., was and still is a Florida corporation doing business in the State of New York.
9. That at all times mentioned herein, the defendant, RYDER SYSTEMS INC., had its corporate headquarters located at 11690 NW 105th Street, Miami, Florida 33178.
10. That at all times mentioned herein, the defendant, RYDER INTEGRATED LOGISTICS, INC., was and still is a Delaware corporation duly authorized to do business in the State of New York.
11. That at all times mentioned herein, the defendant, RYDER INTEGRATED LOGISTICS, INC., was and still is a Delaware corporation doing business in the State of New York.
12. That at all times mentioned herein, the defendant, RYDER INTEGRATED LOGISTICS INC., had its corporate headquarters located at 11690 NW 105th Street, Miami, Florida 33178.
13. That at all times mentioned herein, the defendant, RYDER TRUCK RENTAL, INC., was and still is a Florida corporation duly authorized to do business in the State of New York.
14. That at all times mentioned herein, the defendant, RYDER TRUCK RENTAL, INC., was and still is a Florida corporation doing business in the State of New York.
15. That at all times mentioned herein, the defendant, RYDER TRUCK RENTAL, INC., had its corporate headquarters located at 11690 NW 105th Street, Miami, Florida 33178.
16. That at all times mentioned herein, the defendants, RYDER INTEGRATED LOGISTICS, INC. and RYDER TRUCK RENTAL, INC., designated to receive service of process in New

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York CORPORATE CREATIONS NETWORK INC, located at 600 Mamaroneck Avenue,
Suite 400, Harrison, New York 10528.

17. That at all times mentioned herein, the defendant, TRUE VALUE COMPANY, LLC, its agents, servants, and/or employees, contracted with and/or hired the defendant, RYDER SYSTEMS INC., its agents, servants and/or employees to transport and deliver products and merchandise to and from its distribution centers and to and from its retail stores and affiliated customers and entities.
18. That at all times mentioned herein, the defendant, TRUE VALUE COMPANY, LLC, its agents, servants, and/or employees, contracted with and/or hired the defendant, RYDER INTEGRATED LOGISTICS INC., its agents, servants, and/or employees, to transport and deliver products and merchandise to and from its distribution centers and to and from its retail stores and affiliated customers and entities.
19. That at all times mentioned herein, the defendant, TRUE VALUE COMPANY, LLC, its agents, servants, and/or employees, contracted with and/or hired the defendant, RYDER TRUCK RENTAL, INC., its agents, servants, and/or employees, to transport and deliver products and merchandise to and from its distribution centers and to and from its retail stores and affiliated customers and entities.
20. That at all times mentioned herein, shipping containers displaying the True Value logo were utilized to transport and deliver said products and merchandise to and from its distribution centers and to and from its retail stores and affiliated customers and entities.
21. That at all times mentioned herein, the defendant, RYDER SYSTEMS INC., its agents, servants, and/or employees, provided the trailers and drivers for the purpose of transporting said products and merchandise to and from the defendant, TRUE VALUE COMPANY, LLC, its agents, servants, and/or employees, distribution centers and to and from its retail stores and affiliated customers and entities.

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22. That at all times mentioned herein, the defendant, RYDER INTEGRATED LOGISTICS INC., its agents, servants, and/or employees, provided the trailers and drivers for the purpose of transporting said products and merchandise to and from the defendant, TRUE VALUE COMPANY, LLC, its agents, servants, and/or employees, distribution centers and to and from its retail stores and affiliated customers and entities.
23. That at all times mentioned herein, the defendant, RYDER TRUCK RENTAL, INC., its agents, servants, and/or employees, provided the trailers and drivers for the purpose of transporting said products and merchandise to and from the defendant, TRUE VALUE COMPANY, LLC, its agents, servants, and/or employees, distribution centers and to and from its retail stores and affiliated customers and entities.
24. That at all times mentioned herein, Interstate 95 northbound, in the City of New Rochelle, County of Westchester, State of New York, was and still is a public roadway. That on or about September 11, 2021 at approximately 10:45 p.m., a tractor-trailer carrying a said container bearing the defendant, TRUE VALUE COMPANY, LLC's logo which was being transported by the defendants, RYDER SYSTEMS INC., RYDER INTEGRATED LOGISTICS INC., and/or RYDER TRUCK RENTAL, INC., their agents, servants, and/or employees, was travelling northbound on said Interstate 95 in the City of New Rochelle, County of Westchester, State of New York, when a heavy duty chain was thrown by said tractor-trailer and/or from its container, into the path of the vehicle operated by the plaintiff, STEPHANIE CABRERA, thereby causing it to wrap around an axel of her vehicle and resulting in her losing control and her said vehicle violently then striking a concrete median.
25. That at the time of the foregoing, the plaintiffs, OLGA CASTANEDA and LUIS MONTOYA, were passengers in said plaintiff, STEPHANIE CABRERA's vehicle.
26. That the aforesaid was caused by the negligence, carelessness and recklessness of the defendants, TRUE VALUE COMPANY LLC, RYDER SYSTEMS INC., RYDER INTEGRATED LOGISTICS INC., and RYDER TRUCK RENTAL, INC., their agents,

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servants, and/or employees, in the ownership, operation, maintenance, and control of said tractor-trailer, its container and/or the said heavy duty chain, without any negligence on the part of the plaintiffs, STEPHANIE CABRERA, OLGA CASTANEDA, and LUIS MONTOYA, contributing thereto.

27. That as a result of the foregoing, said plaintiff, STEPHANIE CABRERA, was caused to sustain serious and protracted personal injuries rendering her sick, lame and sore, disabled and in need of medical aid and attention.
28. That said plaintiff, STEPHANIE CABRERA's injuries constitute a serious injury as defined by § 5102(d) of the Insurance Law or economic loss greater than the basic economic loss as defined in § 5102(a) of the Insurance Law.
29. That by reason of the foregoing, the plaintiff, STEPHANIE CABRERA, has been damaged and seeks a sum of money from the defendants, TRUE VALUE COMPANY LLC, RYDER SYSTEMS INC., RYDER INTEGRATED LOGISTICS INC., and RYDER TRUCK RENTAL, INC., which will justly and fairly compensate her for said injuries and damages.

AS AND FOR A SECOND CAUSE OF ACTION

30. Plaintiffs, STEPHANIE CABRERA, OLGA CASTANEDA, and LUIS MONTOYA, repeat, reiterate, and reallege each and every allegation contained in paragraphs marked and designated "1" through "25" with the same force and effect as if more fully set forth at length herein.
31. That as a result of the foregoing, said plaintiff, OLGA CASTANEDA, was caused to sustain serious and protracted personal injuries rendering her sick, lame and sore, disabled and in need of medical aid and attention.
32. That said plaintiff, OLGA CASTANEDA's injuries constitute a serious injury as defined by § 5102(d) of the Insurance Law or economic loss greater than the basic economic loss as defined in § 5102(a) of the Insurance Law.

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33. That by reason of the foregoing, the plaintiff, OLGA CASTANEDA, has been damaged and seeks a sum of money from the defendants, TRUE VALUE COMPANY LLC, RYDER SYSTEMS INC., RYDER INTEGRATED LOGISTICS INC., and RYDER TRUCK RENTAL, INC., which will justly and fairly compensate her for said injuries and damages.

AS AND FOR A THIRD CAUSE OF ACTION

34. Plaintiffs, STEPHANIE CABRERA, OLGA CASTANEDA, and LUIS MONTOYA, repeat, reiterate, and reallege each and every allegation contained in paragraphs marked and designated "I" through "29" with the same force and effect as if more fully set forth at length herein.

35. That as a result of the foregoing, said plaintiff, LUIS MONTOYA, was caused to sustain serious and protracted personal injuries rendering him sick, lame and sore, disabled and in need of medical aid and attention.

36. That said plaintiff, LUS MONTOYA's injuries constitute a serious injury as defined by § 5102(d) of the Insurance Law or economic loss greater than the basic economic loss as defined in § 5102(a) of the Insurance Law.

37. That by reason of the foregoing, the plaintiff, LUIS MONTOYA, has been damaged and seeks a sum of money from the defendants, TRUE VALUE COMPANY LLC, RYDBR SYSTEMS INC., RYDER INTEGRATED LOGISTICS INC., and RYDER TRUCK RENTAL, INC., which will justly and fairly compensate him for said injuries and damages.

WHEREFORE, the plaintiffs, STEPHANIE CABRERA, OLGA CASTANEDA, and LUIS MONTOYA, demand judgment against the defendants, TRUE VALUE COMPANY LLC, RYDER SYSTEMS INC., RYDER INTEGRATED LOGISTICS INC., and RYDER TRUCK RENTAL, INC., on the First, Second, and Third Causes of Action in a sum of money which will justly and fairly compensate them for said injuries and damages, together with the costs, disbursements, and attorneys' fees of this action.

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Dated: Mineola, New York
June 11, 2021

Yours etc.
JOSEPH R. BONGIORNO & ASSOCIATES, P.C.
Attorneys for Plaintiff (s)

BY:


JOSEPH R. BONGIORNO, ESQ
250 Mineola Boulevard
Mineola, NY 11501
(516) 741-2405

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VERIFICATION

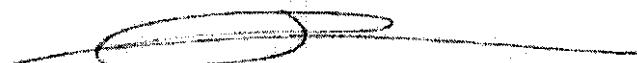
STATE OF NEW YORK)
ss.:
COUNTY OF NASSAU)

JOSEPH R. BONGIORNO, being duly sworn, deposes and says:

That he is the attorney for the plaintiffs, STEPHANIE CABRERA, OLGA CASTANEDA, and LUIS MONTOYA, in the within action. That he has read the foregoing VERIFIED COMPLAINT and knows the contents thereof; that the same is true to the knowledge of deponent, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters, he believes it to be true.

That the source of deponent's information is papers and records in deponent's possession and file.

That the reason this Verification is made by your deponent and not by said plaintiffs is that the plaintiffs are not within the County where deponent maintains his office.


JOSEPH R. BONGIORNO

Sworn before me on the
11 of June, 2021
Elvia Marisol Teran
NOTARY PUBLIC

ELVIA MARISOL TERAN
NOTARY PUBLIC-STATE OF NEW YORK
No. 01TE6288386
Qualified in Queens County
My Commission Expires 07-01-2021

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INDEX NO. YEAR

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

STEPHANIE CABRERA, OLGA CASTANEDA, and LUIS MONTOYA,

Plaintiff(s),

- against -

TRUE VALUE COMPANY LLC, RYDER SYSTEMS INC., RYDER INTEGRATED LOGISTICS
INC., and RYDER TRUCK RENTAL, INC

Defendant(s).

SUMMONS & VERIFIED COMPLAINT

JOSEPH R. BONGIORNO & ASSOCIATES, P.C.

Attorneys for Plaintiff(s)

250 Mineola Boulevard

Mineola, NY 11501

Tel: 516-741-2405 Fax: 516-741-2554

To

Signature (Rule 103-1.1-a)



Attorney(s)

Please take notice

NOTICE OF ENTRY

that the within is a (certified) true copy of an
named court on

duly entered in the office of the clerk of the within

NOTICE OF SETTLEMENT
that an ORDER with notice of settlement of which the within is a true copy will be presented for
settlement to the Honorable , one of the judges of the within named court
at , New York 11901 on at A.M.

Dated: Yours, etc.

JUN 16 2021